

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HILTI AKTIENGESELLSCHAFT,)	
)	
Plaintiff and Counterclaim Defendant,)	
)	
v.)	C.A. No. 1:22-cv-01248-CFC
)	
SPECIFIED TECHNOLOGIES INC.,)	
)	
Defendant and Counterclaimant.)	

**PLAINTIFF HILTI AKTIENGESELLSCHAFT’S
SUPPLEMENTAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT
CONTENTIONS TO DEFENDANT SPECIFIED TECHNOLOGIES INC.**

Plaintiff Hilti Aktiengesellschaft (“Plaintiff” or “Hilti”) makes the following Disclosure of Asserted Claims and Infringement Contentions (“Disclosure”) to Defendant Specified Technologies Inc. (“Defendant” or “STI”), subject to the following preliminary statement and reservation of rights:

1. Plaintiff’s Disclosure is made based upon the information and documents that are presently available and specifically known to Plaintiff, but should not in any way prejudice Plaintiff’s rights to amend and supplement its Disclosure upon further discovery of facts and documents, and further research, investigation and analysis, including but not limited to receipt and analysis of Defendant’s production of documents and disclosure of information (and that to be discovered from third parties) relevant to the claims and defenses herein, including, without limitation, as to the accused machine(s) and processes. Plaintiff has neither concluded its investigation of the facts, witnesses or documents relevant to this case, nor completed its analysis of the available data, and therefore, Plaintiff expressly reserves the right to amend or supplement its Disclosure as additional facts and information are discovered.

CFS-TTS MD 600: claims 3 and 11;

CFS-TTS MD OS: claims 3 and 11;

CS-TTS SA 600: claims 3 and 11; and

CS-TTS SA OS: claims 3 and 11.

f. The '528 Patent

CFS-TTS 600: claims 7 and 17;

CFS-TTS OS: claims 7 and 17;

CFS-TTS R OS: claims 7 and 17;

CFS-TTS MD 600: claims 7 and 17;

CFS-TTS MD OS: claims 7 and 17;

CS-TTS SA 600: claims 7 and 17; and

CS-TTS SA OS: claims 7 and 17.

H. Point of First Infringement and the Start and End of the Damages Period

The timing of the point of first infringement, the start of claimed damages, and the end of claimed damages follows:

a. The '088 Patent

Defendant first infringed the '088 Patent on May 21, 2019, upon issuance of the '088 Patent. Damages began accruing on May 21, 2019, upon issuance of the '088 Patent, and the damages period will end as of the expiration date of the '088 Patent.

b. The '090 Patent

Defendant first infringed the '090 Patent on May 26, 2020, upon issuance of the '090 Patent. Damages began accruing on May 26, 2020, upon issuance of the '090 Patent, and the damages period will end as of the expiration date of the '090 Patent.

Dated: July 17, 2023

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ W. Cook Alciati

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CERTIFICATE OF SERVICE

This is to certify that on July 17, 2023, a true and correct copy of PLAINTIFF HILTI AKTIENGESELLSCHAFT'S SUPPLEMENTAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS TO DEFENDANT SPECIFIED TECHNOLOGIES INC. has been served on all parties through counsel of record via email.

/s/ W. Cook Alciati

W. Cook Alciati